



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Robert C. Shinn, Jr.
Commissioner

*EPA's Nov 14/2000
Comment Gr was included
in these comments*

Mr. Cristopher Anderson
Director Environmental Affairs
L.E. Carpenter & Company
Suite 36-5000
200 Public Square
Cleveland, OH 44114

JAN 05 2001

Dear Mr. Anderson:

Re: L.E. Carpenter Superfund Site
Wharton, Morris County

The New Jersey Department of Environmental Protection (Department) and EPA have reviewed *the Further Off-Site Groundwater Investigation at MW19/Hot Spot 1 Work Plan* dated October 2000 and have the following comments:

1. The proposed location of MW-19-11 should be moved to the northern side of the sewer line to determine if the pipeline acts as a complete hydraulic barrier to ground water contamination.
- ✓ 2. Proposed well MW-19-10 will most likely not provide any additional useful data. It is requested that a deeper well be installed instead of MW-19-10, paired with MW-19-9. Clean samples from this new cluster would represent clear, defensible data that contaminants are not sinking or migrating off-site, and provides for a monitored clean area between the plume and the adjacent residences.
- ✓ 3. Page 9 of the text mentions that the sampling method will include purging with a peristaltic pump, with sample collection using a bailer. Numerous studies have shown that sampling with a bailer can produce variable results, often causing a negative bias in the concentrations of volatiles. The most accurate and reproducible data has been shown to come from purging and sampling with a submersible pump. It is requested that low flow sampling protocol be instituted at this site.
- ✓ 4. Page 9 of the text indicates that data from the study will be used to evaluate the possibility of natural attenuation for the MW-19 area. If this is one of the goals of this study, the work plan should specify types of analyses targeting such an evaluation. The plan should also identify a subset of wells including upgradient, plume, and downgradient, to be run for these parameters.

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Please contact me at (609) 633-7261 if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gwen B. Zervas".

Gwen B. Zervas, P.E.

Case Manager

Bureau of Case Management

C: Stephen Cipot, EPA
Nicholas Clevett, RMT
George Blyskun, BGWPA
John Prendergast, BEERA